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UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

Willie N. Moon and Adnette M. Gunnels-Moon,

Bankr. Case No. 2:13-bk-12466-mkn

Chapter 13

Debtors.

RUSHMORE LOAN MANAGEMENT SERVICES, LLC'S AND DEBTORS' STIPULATION: (I) DISSOLVING BOND AND (II) RELEASING FUNDS FROM THE COURT'S REGISTRY

1 Rushmore Loan Management Services, LLC (“**Rushmore**”) and Adnette M. Gunnels-Moon
 2 and Willie N. Moon (“**Debtors**” collectively with Rushmore, the “**Parties**”) have settled all disputes
 3 between them. To further effectuate their settlement, the Parties, by and through their respective
 4 counsel of record in the above-captioned proceeding, hereby stipulate as follows:

5 The Debtors have waived any right to or claim against the \$300,742.10 bond by Argonaut
 6 Insurance Company, Doc. 228 (the “**Bond**”). Accordingly, the Parties request entry of the attached
 7 proposed order dissolving the Bond and directing the return of any cash value to Rushmore.

8 The Debtors have waived any right to or claim against any sums paid by Rushmore into the
 9 registry of the Court, including the \$67,007.94 per Docs. 271 and 273, receipt number 240457, and
 10 \$3,500.00 per Docs. 352 and 353, receipt number 240688 (the “**Sums in Registry**”). Accordingly,
 11 the Parties request entry of the attached proposed order directing the Clerk to promptly return the
 12 Sums in Registry to Rushmore with all interest thereon upon Rushmore’s transmittal to the Court’s
 13 finance department of a properly completed Form AO 213, as required by LR 7067.

14 Dated: October 19, 2023

15 /s/ Christopher P. Burke

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27 *Attorneys for Rushmore Loan Management*
Services, LLC

1
2 **ORDER APPROVING STIPULATION: (I) DISSOLVING BOND**
3 **AND (II) RELEASING FUNDS FROM THE COURT'S REGISTRY**

4 Pursuant to the stipulation of Rushmore Loan Management Services, LLC ("Rushmore") and
5 Adnette M. Gunnels-Moon and Willie N. Moon ("Debtors" collectively with Rushmore, the
6 "Parties"),

7 **IT IS HEREBY ORDERED THAT:**

8 1. The \$300,742.10 bond by Argonaut Insurance Company, Doc. 228, is hereby
9 dissolved. Any cash value of such Bond shall be paid to Rushmore.

10 2. Upon Rushmore's transmittal of a properly completed Form AO 312 to the Court's
11 finance department, the Clerk is hereby directed to pay all Sums in Registry, namely—

- 12 (a) \$67,007.94, per Docs. 271 and 273, receipt number 240457, and
13 (b) \$3,500.00, per Docs. 352 and 353, receipt number 240688,

14 with all interest accrued thereon—to Rushmore. Rushmore's name, mailing address (for receipt of
15 such funds), and tax identification number (TIN) are as follows:

16 **Rushmore Loan Management Services, LLC**

17 **PO Box 514707, Los Angeles, CA 90051-4707**

18 **TIN: 26-3416474**

19 4. This Court shall retain jurisdiction to hear and determine all matters arising from or
20 related to the implementation, interpretation, or enforcement of this Order.